

\*e filed 12/3/07

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LOCKHEED MARTIN CORPORATION

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Facsimile: 510.273-8911

Attorneys for Plaintiff  
SUSAN C. MORALES

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

SUSAN C. MORALES,  
Plaintiff,

v.

LOCKHEED MARTIN CORPORATION,  
Defendant.

Case No. C 07-03480 JF

**ADMINISTRATIVE MOTION, BY  
STIPULATION, REQUESTING  
EXTENSION OF DEADLINE TO  
COMPLETE MEDIATION**

**[Civil Local Rule 7-11; ADR Local Rule 6-5]**

Current Deadline: December 31, 2007  
Mediation Scheduled: February 1, 2008  
Trial Date: July 28, 2008

Pursuant to Civil Local Rule 7-11 and ADR Local Rule 6-5, Plaintiff Susan C. Morales and Defendant Lockheed Martin Corporation jointly submit this motion and stipulation for administrative relief and request that the Court extend the deadline to complete the court-supervised  
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1.

ADMINISTRATIVE MOTION, BY STIPULATION, REQUESTING EXTENSION  
OF DEADLINE TO COMPLETE MEDIATION

Case No. C 07-03480 JF

1 mediation in this matter from December 31, 2007, to February 15, 2008. Good cause exists for the  
2 requested extension for the following reasons.

3 The parties have commenced discovery in this case and expect to take the depositions  
4 necessary for a meaningful mediation in this matter in December 2007 and January 2008. However,  
5 due to the holidays and the schedules of witnesses and counsel, it is not possible to complete these  
6 depositions and prepare for and conduct the mediation before the current December 31, 2007,  
7 deadline.

8 On November 14, 2007, the court-appointed mediator, Gerald F. George, Esq. of  
9 Pillsbury Winthrop Shaw Pittman, held a pre-mediation telephone conference with counsel for the  
10 parties to discuss the mediation. Among other things, the mediator and counsel discussed the  
11 scheduling of the mediation and agreed it would be appropriate to conduct the mediation in late  
12 January or early February 2008. Subsequently, the mediation was scheduled, by agreement, for  
13 February 1, 2008 at 10:00 a.m. On or about November 20, 2007, the Court sent out an electronic  
14 notice to the parties confirming the mediation date.

15 The trial in this matter is set for July 28, 2008, and the non-expert witness discovery  
16 cut-off is on April 1, 2008. Conducting the mediation on February 1, 2008 and extending the Court-  
17 ordered deadline for completing the mediation will not prejudice any party. Accordingly, the parties  
18 respectfully request that the Court grant this administrative motion and extend the deadline to  
19 conduct the mediation from December 31, 2007, to February 15, 2008.

20 IT IS SO STIPULATED.

21 Respectfully submitted,

22 LITTLER MENDELSON P.C.

23  
24 Dated: November 27, 2007

By:           /s/ Anne-Marie Waggoner          

25 ANNE-MARIE WAGGONER  
26 Attorneys for Defendant  
27 Lockheed Martin Corporation  
28

BOHBOT & RILES, LLP

Dated: November 27, 2007

By: /s/ Karine Bohbot

KARINE BOHBOT  
Attorneys for Plaintiff  
SUSAN C. MORALES

**DECLARATION OF COUNSEL REGARDING SIGNATORIES' CONCURRENCE**  
**WITH THE ELECTRONIC FILING OF THIS DOCUMENT**

I, Anne-Marie Waggoner, hereby declare and state as follows:

1. I am an attorney licensed to practice in the courts of the State of California and the U.S. District Court for the Northern District of California. I am Of Counsel with the law firm of Littler Mendelson, A Professional Corporation, and counsel of record for Defendant Lockheed Martin Corporation.

2. In accordance with U.S. District Court for the Northern District of California, General Order No. 45, I have obtained the concurrence for the filing of this document from each of the other signatories hereto. Littler Mendelson will maintain records to support this concurrence for subsequent production for the court if so ordered or for inspection upon request by a party until one year after final resolution of the action (including appeal, if any).

I hereby declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct, and that this Declaration was executed on November 27, 2007, at San Jose, California.

/s/ Anne-Marie Waggoner  
ANNE-MARIE WAGGONER

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3.

ADMINISTRATIVE MOTION, BY STIPULATION, REQUESTING EXTENSION  
OF DEADLINE TO COMPLETE MEDIATION

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Case No. C 07-03480 JF

**[PROPOSED] ORDER GRANTING  
ADMINISTRATIVE MOTION, BY  
STIPULATION, TO EXTEND DEADLINE  
TO COMPLETE MEDIATION**

**[Civil Local Rule 7-11; ADR Local Rule 6-5]**

Current Deadline: December 31, 2007  
Mediation Scheduled: February 1, 2008  
Trial Date: July 28, 2008

Good cause appearing from the Administrative Motion by Stipulation, Requesting  
Extension of Deadline to Complete Mediation, submitted jointly by Plaintiff Susan Morales and

///

1.

**[PROPOSED] ORDER GRANTING ADMINISTRATIVE MOTION, BY STIPULATION, TO EXTEND  
DEADLINE TO COMPLETE MEDIATION**

1 Defendant Lockheed Martin Corporation, the Court hereby extends the deadline for completing the  
2 mediation from December 31, 2007 to and including February 15, 2008.

3 IT IS SO ORDERED.

4  
5 Dated: 11/30, 2007



6 THE HONORABLE JEREMY FOGEL  
7 United States District Court Judge for the  
8 Northern District of California  
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2 mediation from December 31, 2007 to and including February 15, 2008.

3 IT IS SO ORDERED.

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5 Dated: \_\_\_\_\_, 2007

6 THE HONORABLE JEREMY FOGEL  
7 United States District Court Judge for the  
8 Northern District of California  
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**PROOF OF SERVICE BY US MAIL AND FACSIMILE**

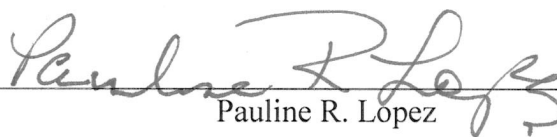
I am employed in Santa Clara County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 50 West San Fernando Street, 14th Floor, San Jose, California 95113.2303. On November 29, 2007, I served a copy of the within document(s) noted below by deposit with the United States Postal Service at the addresses stated below and by telefaxing a copy thereof to the following individuals at the facsimile numbers below:

**ADMINISTRATIVE MOTION, BY STIPULATION,  
REQUESTING EXTENSION OF DEADLINE TO COMPLETE  
MEDIATION AND PROPOSED ORDER**

Facsimile(415) 983-1200 Gerald F. George, Esq. Pillsbury Winthrop Shaw Pittman 50 Fremont Street San Francisco, CA 94105	Facsimile (408)535.5360 Attn: Clerk of the Court US District Court, Northern District San Jose Division Robert F. Peckham Courthouse & Federal Building 280 South First Street San Jose, CA 95113
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I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on November 29, 2007, at San Jose, California.

  
Pauline R. Lopez